

REMARKS

This is responsive to the final office action dated May 3rd, 2003. Pending claims 1-18 stand rejected. Based upon the amendments presented herein, and the comments below, applicants request reconsideration of the claims.

Claim 1 as presently drafted requires that the table within the claimed apparatus store two different pieces of information. The table must store both the network address of entities within a local community of interest, as well as a network over which said party desires to be contacted.

Hence, if a contacted entity is within the local community of interest, the contact is completed over the desired network by the apparatus, since the apparatus can use its own table to lookup the desired network and the address on that network to which the contact should be sent.

If the contact is not within the local community of interest, the contact is sent over the Internet to another server that can perform those functions.

Miller does not disclose these limitations. Miller discloses a system that is analogous to a call center, which Miller describes as a subscriber. Customers call a single number and are prompted by a voice response unit (VRU) to enter information about desired services. The system, if configured to permit that subscriber to access that particular service, routes the incoming call to number that has been prespecified by the subscriber for that particular service. The information associated with particular services may be updated via the Internet. However, *all calls* to a number associated with that particular service, if permitted, are routed to the same place, over the same network. (Miller, cols. 4-5).

Put another way, Miller is merely a call center. Users calling in enter DTMF data indicating whether they desire, for example, the billing department or customer complaint department. In response to such indication, the call is routed to the appropriate place. If the

billing department moves to new network address, the call center that distributes the calls to the billing department may be updated via the Internet. The methodology of permitting this updating is what most of Miller is all about.

Miller does not disclose the use of a table that stores information indicative of *a network address of a contacted party, and a desired network to be used for making particular contacts* as presently required by claim 1. Instead, Miller merely knows that if a caller inputs data indicating that a caller desires to be put in touch with billing services, it should be sent to a particular destination. There is no indication at all of storing a table that indicates which of plural desired networks over which contacts should be directed.

Nor does Miller disclose the use of “at least two network interface units, each for interfacing to a separate one of the at least two networks for receiving requests to contact parties. In fact, Miller teaches away from such a system, as figures 1A and 1B clearly show that all calls arrive from the same telephone network, through switch 14. No provision is made for plural networks from which to receive calls, or to be used at the preference of the called party to transmit calls. In fact, as detailed at column 7, Miller is entirely directed to a phone call center, and the only use of the Internet appears to be to allow the call center operator to reconfigure parameters about where calls for particular services are to be routed.

Miller also does not disclose the steps of ascertaining whether the contacted party is within a local community of interest, and if so, completing the contact, and if not, sending it over the Internet to another server, as required by present claim 1. Instead, Miller merely sends all calls over the same network to be serviced by the appropriate destination (eg. Operator Console 28), and never uses the Internet to send any contact anywhere.

Accordingly, Miller does not disclose a table that stores both network addresses and desired networks to be used to reach a contacted party. Miller does not disclose two separate networks from which to receive, and to which to send, contacts, and Miller does not disclose determining if the contacted party is within the local community of interest. Hence, all of these limitations render the claim in issue patentable over Miller.

Galasso is merely a technique for completing contacts over the Internet by means of a gatekeeper. However, there would be no motivation to combine Galasso with Miller, because Miller does not complete calls over the Internet at all, and hence would have no use for the gatekeeper of Galasso. Moreover, even if the combination were made, there would still be nothing in either reference that would teach the storing of network addresses and an indication of the desired network to use for forwarding the contact to the contacted party, since the calls of Miller would then all be forwarded over the Internet of Galasso. Moreover, the use of two separate networks, and the determination as to whether the contacted party is within the local community of interest, is entirely absent from either reference. Instead, the combination, even if made, would merely yield a system that routes calls to the Internet, instead of over the LAN of Miller. Accordingly, applicant believes the rejection should be withdrawn at this time.

The remaining independent claims are similar in scope, and are believed to be patentable for the same reasons set forth above.

Applicant's have reviewed the Response to Arguments section of the May 3rd office action, and disagree with the Examiner's analysis. The Examiner states that "Miller...as any other system that connected to the Internet, is capable of requesting a called party address to a remote server in order to establish a connection with the called party." The Examiner is under the impression that Miller routes contacts of the Internet, and that if the part of Miller that

performs such routing does not have the contacted party address, it can get it from another server over the Internet and still route the contact.

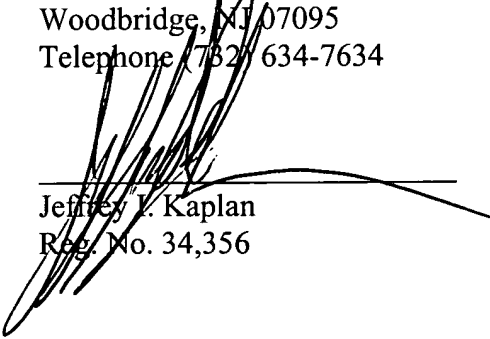
However, the destinations to which the calls are routed in Miller are all directly within the platform of figure 1A. The Internet is not used to route contacts at all, whether within the local community or not, and whether any address is stored or not. The only use of the Internet in Miller is to permit the operator of the call center to change the configuration of it. Incoming calls from calling parties are never routed to the Internet, or even to the PSTN. Rather, they are simply sent to one of plural applications connected to Ethernet 26. (See Fig. 1A, and col. 5)

In view of the foregoing, applicant's respectfully request reconsideration and allowance of the claims in issue. The Examiner is authorized to deduct any additional fees believed due from our deposit account number 11-0223.

Respectfully submitted,

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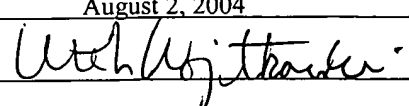
DATED: August 2nd, 2004


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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal service as first class mail, in a postage prepaid envelope, addressed to Mail Stop: RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on August 2nd, 2004.

Dated August 2, 2004

Signed 

Name Ute H. Wojtkowski